

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JOSE ANTONIO RAMOS , et al Plaintiffs vs. DEPARTMENT OF HOMELESS SERVICES, BREAKING GROUND Defendants	: : : : : :	: CASE No. _____ : : : : : :
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CIVIL COMPLAINT

AND NOW, comes your Plaintiff and similar situated individuals in the above entitled captioned legal matter before the Court, pursuant to Federal Rules of Civil Procedure Rule 3&4, this Court has jurisdiction pursuant to 28 USC section 1331, 1332, and does here by submit this Civil complaint for the following reasons stated as follows:

STATEMENT OF FACTS


1. Plaintiff herein was originally a homeless individual living on the streets of New York City, from May 4 2020, till July 23, 2021.
2. Defendant Breaking Ground offered Plaintiff a temporary housing at 123 East 15th Street New York, New York, plaintiff was housed in a small room on the third floor of the building, room 1300.
3. Plaintiff was then told than in order to secure permanent housing that Plaintiff would, have to get a Social Security Card, State Identification, Passport, and be given an interview by the Staff of Breaking Ground Defendants herein.
4. Plaintiff complied with all the requirements given to him by Defendants herein and during the course of nine months no permanent housing was offered to Plaintiff, yet several other individuals who were only three weeks at 123 East 15th Street, were given housing by Defendants herein.
5. During the course of Plaintiffs stay at 123 East 15th Street, Plaintiff informed the staff that there was no safety strips or safety bars in the showers or the bathrooms, at 123 East 15th Street, plaintiff continually informed the staff at 123 East 15th Street, yet the matter of safety was totally ignored by Defendants herein.

6. Plaintiff herein and several other similar situated individuals at 123 East 15th Street are seniors with some handicaps and are fearful from using the showers or bathrooms at 123 East 15th street, Defendants herein have refused to correct and comply with the laws, for handicapped individuals and similar situated individuals in the State of New York.
7. Plaintiff herein is a veteran and served in the U.S. Navy and is of the age of 78-year's old and as such should have been given preference over permanent housing, by Defendants herein.
8. Defendants herein have with malous and willful intentions have denied Plaintiff and Other similar situated individuals at 123 East 15th Street, N.Y. N.Y. 10003 with safe and adequate permanent housing in the City of New York.

RELIEF REQUESTED

Plaintiff and similar situated individuals are requesting that the defendants herein be issued an order by the Court to come in compliance with the laws of handicapped persons in the State of New York and that failing to do so that defendants herein pay to Plaintiffs and similar situated individuals the sum of Eighty-thousand U.S. dollars per day. For negligence and discriminatory actions conducted by Defendants herein. Furthermore, Plaintiff and similar situated individuals are requesting that the Court issue an order of a preliminary injunction on Defendants herein, to prevent Defendants herein from conducting any retaliatory actions against Plaintiffs and similar situated individuals at 123 East 15th Street, New York, New York 10003.

RESPECTFULLY SUBMITTED


Mr. JOSE ANTONIO RAMOS
Pro Se, in Behalf of all similar
situated individuals

DATED: May 13 2022

**IN THE UNITES STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JOSE ANTONIO RAMOS et al Plaintiffs	:	CASE No. _____
	:	
	:	
vs.	:	
DEPARTMENT OF HOMELESS SERVICES AND BREAKING GROUND	:	
	:	
Defendants	:	

CERTIFICATE OF SERVICE


AND NOW, comes your Plaintiff, Pro Se, in the above captioned legal matter before the Court, pursuant to the Federal Rules of Civil Procedure Rule 5 and does hereby submit the herein attached document to the below listed Defendants herein as follows:

SERVICE BY CERTIFIED U.S. MAIL:

Department of Homeless Service
33 Beaver Street, 17th Floor
New York, N. Y. 10004

Breaking Ground
505 8th Avenue, 2nd floor
New York, N.Y. 10018

RESPECTFULLY SUBMITTED


Mr. Jose Antonio Ramos, Pro Se
In behalf of all similar situated
Individuals at 123 East 15th Street
New York, N.Y. 10003

DATED: May 13 2022